

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Christopher Irving,	)	
	)	22-CV-6599
Plaintiff,	)	
	)	Honorable Andrea R. Wood
v.	)	
	)	Magistrate Judge Heather K. McShain
Cook County Sheriff's Office,	)	
et al.,	)	JURY DEMANDED
	)	
Defendants.	)	

**DEFENDANTS' MOTION FOR AN EXTENSION OF TIME  
TO ANSWER OR OTHERWISE PLEAD**

Defendants Cook County Sheriff's Office, Martha Yoksoulion, Erica Queen, Esequiel Iracheta, Laneshia Pondexter, Patrick Fitzgerald, Daniel Lakowski, and Cook County, (hereinafter "Defendants"), by their attorney KIMBERLY M. FOXX, State's Attorney of Cook County, through her assistant, Molly E. Boekeloo, pursuant to Federal Rule of Civil Procedure 15(a)(3), respectfully moves this Court for an extension of time up to and including February 10, 2023, to answer or otherwise plead to Plaintiff's Complaint. In support of this Motion, Defendants state the following:

1. Plaintiff filed his Complaint in this matter on November 23, 2022. (Dkt. 1).
2. On December 27, 2022, undersigned Counsel became aware of the case and was assigned to represent the aforementioned Defendants.
3. The next day, on December 28, 2022, undersigned Counsel filed her appearance on behalf of Defendants Cook County Sheriff's Office, Martha Yoksoulion,

Erica Queen, Esequiel Iracheta, Laneshia Pondexter, Patrick Fitzgerald, Daniel Lakowski. (Dkt. 5).

4. On January 4, 2023, undersigned Counsel filed her appearance on behalf of Defendant Cook County. (Dkt. 15).

4. Defendants request an enlargement of time to answer or otherwise plead up to and including February 10, 2023.

5. This request for enlargement of time is made in good faith and not to delay or prejudice Plaintiff. Rather, it is to allow undersigned counsel to properly:

- investigate Plaintiff's allegations and claims;
- discuss this matter with Defendants;
- to attempt to contact Defendant Lobiancao regarding service and representation;
- to evaluate any potential conflicts of interest between Defendants;
- and,
- to and to prepare an answer or other responsive pleading to Plaintiff's Complaint.

6. Additionally, due to previously scheduled vacations and commitments in other cases, such as dispositive motion briefing in *Saldana, Maria v CCHHS*, (19 C 6178), Defendants require additional time to answer or otherwise respond to Plaintiff's Complaint.

7. This is Defendants' first request for an extension of time to answer or otherwise plead.

8. On December 29, 2022, the parties corresponded regarding this Motion, and Plaintiff is unopposed.

9. Defendants respectfully request that this Court grant this Motion for an Extension of Time to Answer or Otherwise Plead.

WHEREFORE, Defendants respectfully request that this Honorable Court grant the following relief:

- (a) an enlargement of time up to and including February 10, 2023 to file an answer or otherwise plead; and,
- (b) to grant any other relief it deems necessary and just.

Respectfully submitted,

KIMBERLY M. FOXX  
State's Attorney of Cook County

/s/Molly E. Boekeloo  
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#### **CERTIFICATE OF SERVICE**

Molly E. Boekeloo hereby certifies that, in accordance with FED. R. CIV. P. 5. and LR 5.5 and the General Order on Electronic Case Filing (ECF), the foregoing was served pursuant to the District Court's ECF system as to ECF filers on January 4, 2023.

/s/ Molly E. Boekeloo  
Molly E. Boekeloo